



EDUCATION AND WORKFORCE DEVELOPMENT CABINET
Kentucky Department for Libraries & Archives

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Joseph U. Meyer
Secretary

Wayne Onkst
State Librarian

May 1, 2012

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Lifeline and Link Up Reform and Modernization - WC Docket No. 11-42
Lifeline and Link Up - WC Docket No. 03-109
Federal-State Joint Board on Universal Service - CC Docket No. 96-45
Advancing Broadband Availability Through Digital Literacy Training - WC Docket No. 12-23

Dear Secretary Dortch:

The Kentucky Department for Libraries and Archives (KDLA) respectfully writes in support of the comments submitted in this proceeding by the American Library Association (ALA) to increase the capacity of libraries across the nation to support the digital literacy needs of their communities.

KDLA supports public library service in all 120 counties in the state of Kentucky. These public libraries serve the state's population of 4.37 million residents. The largest library system in Louisville serves a population of 741,069 with 17 branches, and the smallest system serves two sparsely populated counties with bookmobile service. 83% of Kentucky's libraries serve rural populations.

Kentucky public libraries will be strong candidates for participation in a digital literacy training program. According to a report released last November, broadband adoption in Kentucky ranks 5th lowest in the

nation at 58%. The same report found the rural broadband adoption rate in the state was only 49%.¹ Nearly 80% of the state's public libraries provide the only source of free Internet and computer access in their communities², and are uniquely placed to deliver digital literacy training to the 51% of rural individuals that do not have broadband at home. KDLA believes savings from the Lifeline program could be effectively leveraged by Kentucky's public libraries to expand our reach to more people and to support new training in libraries that have lacked trainers and other resources to meet the digital literacy needs of their residents.

The comments of ALA articulate many concerns that we share in considering how to increase the capacity of local libraries, as well as strategies for implementing the program that we believe will result in a successful, scalable, and sustainable digital literacy program.

In particular, we wish to focus on several points made by ALA that we support and would ask the Commission to consider.

- KDLA is strongly opposed to a match requirement. As stated in the Commission's proposal, the \$4,500 match represents 83% of the cost rural libraries are paying for telephone and Internet access. Telecommunications and Internet access costs for rural libraries participating in the E-rate program average \$5,438 before program discounts are applied. For rural libraries without multiple branches, the average cost of Internet access is \$2,963³. We are convinced that the match would eliminate an opportunity for the rural communities that could benefit the most from digital literacy training.
- KDLA is opposed to adding a digital literacy component to the E-rate program. E-rate discounts are an essential resource for our libraries' connectivity and infrastructure needs. The program is already overburdened, with funding requests increasing 21.5% for FY2012 to \$5.237 billion⁴. We believe the program should not be altered to include digital literacy.
- KDLA supports funding libraries that currently offer digital literacy training, in addition to those that do not offer training. These funds would enable libraries that have recently started digital literacy training to continue, and allow others with more established programs to expand their efforts. As an example, one of

¹ NTIA, U.S. Dep't of Commerce, Exploring the Digital Nation: Computer and Internet Use at Home (Nov. 2011), *available at* <http://www.ntia.doc.gov/report/2011/exploring-digital-nation-computer-and-internet-use-home>.

² American Library Association, Libraries Connect Communities: Public Library Funding & Technology Access Study 2010-2011, *available at* http://www.ala.org/research/initiatives/plftas/2010_2011.

³ Data gathered from the 83 libraries participating in the E-rate program during FY2012.

⁴ USAC FY2012 Demand Estimate (Apr. 2012), *available at* <http://usac.org/res/documents/sl/pdf/samples/FY2012-Demand-Estimate.pdf>.

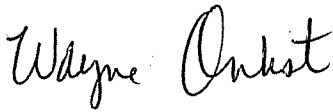
the libraries participating in the BTOP PCC Workforce Opportunity Expansion project already offered a full suite of classes in the library computer lab. Using BTOP funds, they were able to hire a trainer and equip a mobile laptop lab so that training could be offered in all areas of the county. The trainer reports resounding success in the small community located farthest from the library. Funding libraries that currently offer digital literacy training would allow them to reach even more potential broadband adopters.

- KDLA strongly supports ALA's recommendation that libraries be allowed to design a suite of training options that would meet the needs of patrons seeking digital literacy support. Many libraries in Kentucky's BTOP PCC Workforce Opportunity Expansion project report that the population that could most benefit from training are also the most reluctant to participate in formal classroom settings. BTOP library staff devoted 6,585 hours to answering 24,353 informal digital literacy related questions from July – December 2011. During that same period, 4,679 people participated in 769 hours of formal training sessions. One library has responded to the need for informal instruction by setting up a special drop-in lab: "Our library has also provided a basic "basic" computer lab where we set up laptops and have our tech staff available during a 2 hr. set time period for practice sessions to follow up the classes. This has been especially successful for our struggling class participants." This kind of flexibility is an essential component of a successful digital literacy program.
- KDLA supports a minimum funding level of \$25,000 per entity per year and a two-year application cycle. Of the 46 libraries participating in the BTOP PCC Workforce Opportunity Expansion project, 28 have requested funds for training. The average amount requested per trainer from July – December 2011 was \$40 per hour. This is slightly higher than the amount listed in the Commission's proposal. Only 3 of the BTOP participating libraries are considered urban by USAC's E-rate guidelines, and they are not located in Kentucky's largest cities. We are concerned that training costs in larger metropolitan areas will be higher than \$40 an hour.
- KDLA supports a flexible program design that includes state-wide consortium applications to maximize the number of libraries that could benefit from the initiative and minimize the burden on smaller libraries. We believe consortium applications would likely support the most cost-effective implementation of the program.

- KDLA suggests that the Commission build on the experience of the National Telecommunications and Information Administration (NTIA) and the Institute of Museum and Library Services (IMLS) in developing the digital literacy program.

KDLA strongly supports the Commission's proposal to use savings from the Lifeline program to increase digital literacy training in our nation's libraries and schools. Kentucky libraries stand ready to help the Commission achieve its goal of increasing opportunities for the public to improve their digital literacy skills so that the benefits of broadband can truly be realized.

Respectfully submitted,

A handwritten signature in black ink that reads "Wayne Onkst". The signature is written in a cursive style with a large, stylized "W" and "O".

Wayne Onkst

State Librarian & Commissioner

Kentucky Department for Libraries and Archives